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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC,

14 Plaintiff,

15 vs.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

18 Defendants.

CASE NO. 3:17-cv-00939

**PLAINTIFF WAYMO LLC'S NOTICE OF
SUBMISSION OF INTERROGATORY
RESPONSES**

Pursuant to Judge Alsup's Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases, Paragraph 21, Plaintiff Waymo LLC ("Waymo") hereby provides final packets for interrogatory responses.

Rulings will be required on objections to the following:

Appendix A	Defendants Uber Technologies, Inc. and Ottomotto LLC's Firth Supplemental Responses to Waymo's First Set of Common Interrogatories (Nos. 1-3) (SEALED)	Common Interrogatory No. 1
Appendix B	Defendants Uber Technologies, Inc. and Ottomotto LLC's Supplemental Responses to Waymo's First Set of Expedited Interrogatories	Interrogatory No. 3

DATED: February 7, 2018

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC

APPENDIX A

FILED UNDER SEAL

APPENDIX B

HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY

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14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA
**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
SUPPLEMENTAL RESPONSES TO
WAYMO'S FIRST SET OF
EXPEDITED INTERROGATORIES
PURSUANT TO PARAGRAPH SIX OF
THE MAY 11, 2017 PRELIMINARY
INJUNCTION ORDER (NOS. 1, 3, 6)**

~~HIGHLY CONFIDENTIAL – ATTORNEYS EYES ONLY~~

~~destroyed the discs. Uber never received those discs, and does not know whether those discs contained any of the “DOWNLOADED MATERIALS.”~~

INTERROGATORY NO. 3:

IDENTIFY all Uber Devices and Non-Uber Devices (as those terms are defined in UBER00006444) that LEVANDOWSKI has used to access any of DEFENDANTS’ Networks (as that term is defined in UBER00006444), or that LEVANDOWSKI could have used to access any of DEFENDANTS’ Networks (as that term is defined in UBER00006444).

RESPONSE TO INTERROGATORY NO. 3:

~~Defendants object to this interrogatory because it implicates information protected by the attorney-client privilege, the work-product doctrine, and the common interest and joint defense privileges. Defendants further objects to this interrogatory to the extent it purports to require expert opinion. Defendants further object to the interrogatory as vague, ambiguous, and overbroad because it asks for the identity of any device that Levandowski “could have used” to access Defendants’ networks, which is infinite in scope.~~

~~Subject to and without waiving the general and specific objections above, Defendants respond as follows:~~

~~To Defendants’ knowledge, Mr. Levandowski used two devices to access Uber’s networks:~~

- ~~1. A MacBook Pro (15-inch, 2016) computer provided to Mr. Levandowski by Uber~~
- ~~2. A personal MacBook Pro (not issued by Uber)~~

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

Subject to and without waiving the general and specific objections above, Defendants respond as follows:

To Defendants’ knowledge, Mr. Levandowski used three devices to access Uber’s networks:

1. A MacBook Pro (15-inch, 2016) computer provided to Mr. Levandowski by Uber
2. A MacBook Pro (not issued by Uber)
3. An iPhone 7 provided to Mr. Levandowski by Uber

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

~~Anthony Levandowski and Mr. Ron in October 2016.~~

Dated: August 24, 2017

MORRISON & FOERSTER LLP

By: /s/ Arturo J. González
ARTURO J. GONZÁLEZ

Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

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I declare under penalty of perjury that the foregoing is true and correct. Executed at Palo Alto, California, this 24th day of August, 2017.

<p>_____ Ethel Villegas (typed)</p>	<p>_____ /s/ Ethel Villegas (signature)</p>
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HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

VERIFICATION

I, Eric Meyhofer, declare:


1. I am Head of ATG for Defendant Uber Technologies, Inc. (“Uber”) in the above-captioned action, and I am authorized to execute this verification on behalf of Uber and Ottomotto LLC.

2. I have read Defendants Uber Technologies, Inc. and Ottomotto LLC’s Supplemental Responses to Waymo’s First Set of Expedited Interrogatories (Nos. 1, 3, 6) (the “Responses”), and know the contents thereof.

3. I am informed and believe that the matters stated in the Responses are true and correct and, on that ground, allege that the matters stated therein are true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of October, 2017, at Pittsburgh, Pennsylvania.


Eric Meyhofer